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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

February 11, 1997

FILE COPY

Reply To
Attn of: WCM-126

George H. Sylvester
Van Waters & Rogers, Inc.
3950 N.W. Yeon Avenue
Portland, OR 97210

Subject: Status of the RCRA 3008(h) Administrative Order on Consent to Perform a RCRA Facility Investigation and Corrective Measures Study. RCRA Docket No. 1087-10-183008

Dear Mr. Sylvester:

On November 12, 1996, representatives of Van Waters and Rogers, Inc. (VW&R) met with the United States Environmental Protection Agency (EPA) to present the status of the RCRA Corrective Action at their Portland facility.

During its presentation VW&R proposed to discontinue the implementation of the ground water treatment system as contemplated in the agreed Interim Corrective Measure Work Plan. VW&R proposed that natural attenuation of the ground water and the Soil Vapor Extraction System already in place could complete the corrective action at the facility.

The latest data provided by VW&R in Progress Report 50, dated November 1996, suggests that the plume of contaminants is no longer being contained on the site. The groundwater pump and treat system as proposed in the Interim Corrective Measures Work Plan is intended to prevent the contaminants from migrating off-site. The EPA believes the priority at this point is to begin source control and mitigate the effect of contaminant and groundwater migration. As a result, the EPA disagrees with VW&R's proposal to discontinue the implementation of the groundwater pump and treat system at this time.

The EPA appreciates the fact that part of the reason for the delays in starting the ground water pump and treat system has been VW&R's inability to obtain an NPDES permit during the last several years. The EPA would like to meet with VW&R to discuss

these issues. Enclosed are EPA comments on VW&R's Progress Report No. 50, dated January 10, 1997. Once VW&R has had a chance to review our comments, please give me a call at (206) 553-6646 to set up a meeting.

Sincerely,

Michael Fagan
RCRA Compliance Officer

Enclosure

bcc: Bob Hartman, EPA ORC
Rene Fuentes, EPA OEA

CONCURRENCES					POLICY FILE	
Initials:					**Yes** ☒	**No** ☐
Name:	MIKESLATER				**If policy file please bcc to Mike Slater**	
Date:						
RCRIS EVENT	**Yes** ☐	**No** ☒				
REGION 9 POLICY FILE	**Yes** ☐	**No** ☐				

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

4 February 1997

MEMORANDUM

SUBJECT: Review of VW&R Portland Progress Report No. 50, dated November 1996

FROM: Rene Fuentes, Hydrogeologist
Office of Environmental Assessment

TO: Mike Fagan, Project Manager
RCRA Compliance

I have reviewed the Van Waters & Rogers RCRA Progress report number 50 after we had an opportunity to meet with the facility and their consultants. As I have mentioned previously, work had been proceeding on schedule to install a pump and treat system, but a number of delays, mainly due to the inability to obtain an NPDES permit during the last several years, have led the facility to consider dropping that requirement as agreed to in the Order.

Over the years the ground water quality sample analyses from wells in multiple locations throughout the facility have documented serious contamination by multiple chlorinated organic compounds. Overall the ground water contamination concentrations and distribution have been relatively stable up to the recent progress reports. The concentrations and distribution of contaminants presented in previous reports, including mainly reports XLIV (October 1995) and this report, indicate that there has been a change in the ground water gradients, and significant changes in the concentrations of several wells. It is my interpretation that the previous, apparently stable plumes, have become unstable and uncontrolled, although the reasons for the changes in gradients are not clear as of now.

There are a number of changes in the water quality concentration which are of concern. The most disturbing changes are the increases in concentration in wells SMW-11 and SMW-8, which happen to be at the northern end and the southern end of the facility. These wells have increased in concentration significantly, and it is my interpretation that from plume maps, such as the one for CIS-1,2-Dichloroethene, that the contamination is now uncontrolled and leaving the site. It is also impossible to continue tracking the plume since there are no

wells in the apparent directions of flow beyond these two wells. It will probably be necessary to install additional wells off-site to follow, and control, the contamination in both of those general directions.

In addition, there has been a general decrease of the contamination in several of the wells in the central part of the plumes, but it may be that the contamination has shifted to the area under the building and we cannot monitor it (due to the lack of wells under the building area) for the time being, until it reaches the wells to the east. The nearest wells are about 150 feet away in the east side of the building, and about 300 feet to the north if the plumes move under the building.

One major issue which needs to be resolved is that of the pumping system, which should be activated soon, and probably extended, to control this presently uncontrolled plume of contaminants. The concept of natural attenuation is not likely to be acceptable unless the plume can be determined to be stable and the source areas remediated to acceptable levels. This will probably require additional assistance and reviews from the EPA Technical Support group at the Ada, OK research laboratory, which I have requested.

As we discussed with the facility at the meeting, the next report should have a complete set of water quality tables included in the text, as well as graphs to summarize the soil vapor extraction system mass removal rates, cumulative removal over time, etc. It should also include the well surveyed location data, which I have also requested to receive before report number 51 is due.

Some additional comments on this site.

The electronic water quality and soils data which we have at EPA is only up to December 1993, and we need that updated with a new data disk. I have called Mr. George Sylvester to request that data and he requested that Mr. Dan Balbiani (EMCON) send it to us directly. I understand the data will be here in the very near future, but have not received it yet. In addition to the updated data we need to have the surveyed locations of the wells and other sampling points in order to enter this information into the EPA GIS system.